

**ENCLOSURE 2**

No Further Action At This Time Determination

Louisiana Department of Environmental Quality, Remediation Services Division  
August 31, 2006



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

**FILE COPY**

REC'D SEP 05 2006

**AUG 31 2006**

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED (7004 1160 0000 3798 0422)**

Mr. Earl Hayden  
Shell Chemical LP  
One Shell Plaza  
910 Louisiana Street  
Houston, TX 77002-4916



GEO SYNTec CONSULTANTS

PROJECT NO. SB0337  
PROJECT NAME : \_\_\_\_\_  
CATEGORY : \_\_\_\_\_

RE: No Further Action Notification  
Shell Chemical LP – Taft Facility; AI Number 583  
Hahnville, St. Charles Parish

Dear Mr. Hayden:

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has completed its review of your *Groundwater DNAPL Delineation Report* dated August 16, 2006 for the above referenced facility located in St. Charles Parish. Based on our review of this document and all previously submitted information, we have determined that no further action is necessary at this time. The Basis of Decision for this notification is attached.

No soils may be removed from this site without prior approval from LDEQ unless they are removed and disposed at a permitted disposal facility.

If you have any questions or need further information, please call Jeffrey Jones at (225) 219-3397. Thank you for your cooperation in addressing this site.

Sincerely,

Keith L. Casanova, Administrator  
Remediation Services Division

jtj

Attachment

## ENVIRONMENTAL ASSESSMENT

: PO BOX 4314, BATON ROUGE, LA 70821-4314

P:225-219-3236 F:225-219-3239

WWW.DEQ.LOUISIANA.GOV

Mr. Earl Hayden  
Shell Chemical LP  
Page 2

c: Imaging Operations - SW

Jeffrey Jones, LDEQ, Environmental Technology Division, Geology Section  
Carolyn Bourn, LDEQ, Environmental Technology Division, Toxicology Section

GeoSyntec Consultants, Attn.: Warren Brady  
5420 Corporate Blvd., Suite 303, Baton Rouge, LA 70808

Environmental Issues Management, LLC, Attn.: Robert Phelan  
75438 River Road, Covington, LA 70435

**BASIS OF DECISION FOR NO FURTHER ACTION**  
**Shell Chemical LP – Taft Facility**  
**AI# 583**

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has determined that the Shell Chemical LP – Taft Facility requires No Further Action At This Time.

The Facility previously produced polybutylene in bulk pellet form from 1972 through 2002, and was operated by Shell Chemical LP (Shell) from 1977 until its closure. Surface releases of Dowtherm G<sup>TM</sup> (a heat transfer fluid) were reported and site investigations and remediation focused on constituents of this product.

Soil and groundwater assessments at the former Taft Plant were conducted to address potential impacts of Dowtherm G<sup>TM</sup>. A chronological list of corrective action activities including site assessment, risk characterization, and remedial actions is summarized as follows:

- In the mid-1980's, Shell installed 20 shallow groundwater assessment wells to determine if the component constituents of Dowtherm G<sup>TM</sup> had impacted groundwater underlying the site. Groundwater samples from these wells were collected and analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), and semi-volatile organic compounds (SVOC) since 1988.
- In 1990, Shell conducted a Phase I assessment to further investigate the distribution of Dowtherm G<sup>TM</sup>, SVOCs, and TPH in soils. Soil borings were drilled to a depth of 50 feet below ground surface and the previously installed monitoring wells were gauged and sampled.
- In 1992, Shell conducted a Phase II assessment to delineate the extent of site constituents in shallow and deep groundwater. This included an evaluation of the hydrogeologic conditions influencing the occurrence and migration of constituents in groundwater and soil. As a result of this investigation, an Interim Measures Plan was submitted to the LDEQ that described the assessment results to date and provided a plan to address the presence of residual DNAPL observed in site monitoring wells<sup>1</sup>. The plan called for the thickness of DNAPL to be gauged on a semiannual basis. If DNAPL was encountered, the DNAPL was removed with a bailer and disposed of in accordance with regulatory requirements. DNAPL gauging and recovery was performed on a quarterly basis until 2003.
- A risk assessment report was prepared in 1993 to evaluate the potential risks due to industrial exposure to chemicals detected on site. The calculated risks were below the

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<sup>1</sup> Woodward-Clyde Consultants, 1994. "Interim Measures Plan. Shell Chemical Company, Taft, Louisiana."



USEPA target risk range of  $10^{-4}$  to  $10^{-6}$  for incremental cancer risk and less than 1 for non-carcinogenic risks.

- In January 1998, Shell submitted a Risk-Based Corrective Action (RBCA) Plan for the site. The submittal was consistent with the LDEQ Draft RBCA program. The RBCA Plan concluded that groundwater impacts did not require further corrective action.
- In September 2003<sup>2</sup> and April 2004<sup>3</sup>, Shell provided an updated RECAP assessment and addendum, respectively, to LDEQ in response to LDEQ comments on previous submittals. The RECAP Addendum included a DNAPL Source Characterization and Recovery Plan to improve the characterization and delineation of the soil residual DNAPL source. LDEQ provided a conditional approval of the RECAP addendum requesting additional soil and groundwater sampling in the DNAPL Source Characterization and Recovery Plan.
- In 2005, a soil investigation in the vicinity of wells with measurable DNAPL (MW-5, MW-11, and MW-19) was conducted to refine the delineation of residual DNAPL in soil. In addition, all monitoring wells were gauged for the presence of DNAPL and a subset of existing wells and a temporary well located between MW-11 and MW-19 were sampled for VOCs and SVOCs.
- A DNAPL gauging and recovery program was also conducted during 2005. On a quarterly basis, DNAPL was only routinely recovered from three shallow monitoring wells (MW-5, MW-11, and MW-19) and the subsequent recovery was documented and provided to LDEQ.
- Results from these sampling programs indicated that groundwater in the area of the three wells with DNAPL (MW-5, MW-11, and MW-19) was the sole medium at the site that exceeded site RECAP standards.
- In 2006, an investigation was conducted in the immediate vicinity of the above mentioned wells to refine the residual DNAPL delineation in the shallow-zone groundwater. The results of this investigation were used to identify the soils to be excavated for site remediation. The excavation was conducted in July 2006 and documented in the DNAPL Remediation Report<sup>4</sup> (GeoSyntec, 2006c).

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<sup>2</sup> URS, 2003. "Risk Evaluation Corrective Action Program (RECAP), Shell Taft Plant, St. Charles Parish, Louisiana, LDEQ AI No. 583," Shell Chemical Company, Taft, Louisiana, September 18.

<sup>3</sup> GeoSyntec Consultants, 2004. "Risk Evaluation Corrective Action Program (RECAP) September 18, 2003 Report Addendum, Shell Taft Plant, St. Charles Parish, Louisiana, LDEQ AI Number 583," Shell Chemical LP, Taft, Louisiana, July.

<sup>4</sup> GeoSyntec Consultants, 2006. "Groundwater DNAPL Remediation Report, Shell Chemical LP, Taft, Louisiana, AI Number 583," August.

Remedial standards were developed for this property using LDEQ's RECAP Management Option 1 (MO-1) standards. The standards that were applied to this site are listed in the table that appears at the end of this BOD. The yield of the shallow-zone and deep-zone groundwater bearing units are below 800 gallons per day and no domestic or agricultural water supply wells are located within one mile of the site. Additionally, the nearest surface water body down gradient from the site is not classified as a drinking water supply. Consequently, the groundwater at this site is classified as GW3 non-drinking water. The Facility was previously used for industrial purposes. Although structures from historical industrial use are present at the site, the site is currently idle. In the future, the site will continue to be designated for industrial use.

Remedial actions consisted of the excavation and disposal of soil and groundwater exceeding the MO-1 standards in the areas of monitoring wells MW-5, MW-11, and MW-19. Approximately 412 tons of soil and groundwater were removed and disposed of at the Waste Management, Inc. Facility in Walker, Louisiana as a result of this remedial action. No Further Action At This Time is granted when contamination is reduced to the extent necessary to achieve the established standards.

In accordance with LAC 33:I. Chapter 13, if land use is going to be changed from industrial to non-industrial, the responsible party shall notify the LDEQ within thirty (30) days and the Shell Chemical LP-Taft Facility shall be reevaluated to determine if conditions are appropriate for the proposed land use. Future use may dictate additional remedial activities. A conveyance notice indicating that the Facility was closed under industrial standards and identifying the future site land use as industrial was filed in both the deed records and mortgage records of the St. Charles Parish Clerk of Court's Office following completion of remediation activities.

An inspection of the site was performed on August 3, 2006 confirming that no investigation derived waste remains on site. No soils may be moved from this location without written authorization from the LDEQ unless they are removed and disposed at a permitted disposal facility. All site monitoring wells were plugged in accordance with LDEQ/LDOTD requirements in July 2006.

The impacted soil and groundwater, constituents of concern, maximum concentration remaining on site and limiting RECAP standards established for this site are listed in the following table:

Medium	Constituent of Concern	Maximum Remaining Concentration	Limiting RECAP Standard
Soil	Diesel Range Organics	3,200 mg/kg	*10,000 mg/kg
Soil	Biphenyl phenyl ether	160 mg/kg	1,100 mg/kg
Soil	Diphenyl ether	580 mg/kg	1,100 mg/kg
Groundwater	Diesel Range Organics	4.62 mg/L	5,280 mg/L
Groundwater	Gasoline Range Organics	0.55 mg/L	6,860 mg/L
Groundwater	Biphenyl phenyl ether	0.61 mg/L	21 mg/L
Groundwater	Diphenyl ether	0.0737 mg/L	21 mg/L
Groundwater	Di-isopropyl ether	0.345 mg/L	2,420 mg/L
Groundwater	Bis(2-ethyl-hexyl)phthalate	0.018 mg/L	0.07 mg/L

\*Maximum concentration allowable under RECAP.



Mr. Earl Hayden  
Shell Chemical LP  
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**Additional information on the details of the investigation and evaluation of this site may be obtained from LDEQ's Public Records Center located in the Galvez Building, Room 127, 602 N. Fifth Street, Baton Rouge, LA 70802. Additional information regarding the Public Records may be obtained by calling (225) 219-3168 or by emailing [publicrecords@la.gov](mailto:publicrecords@la.gov)**

## Recordation Certificate

Charles J. Oubre, Jr.  
Clerk of Court  
St. Charles Parish Courthouse  
PO Box 424  
Hahnville, LA 70057  
(985) 783-6632

### First VENDOR

SHELL CHEMICAL LP

### First VENDEE

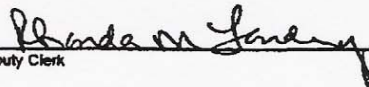
Index Type : CONVEYANCE  
Type of Document : AFFIDAVIT

Entry Number : 321565

Recording Pages : 6

Book : 676 Page : 338

### Recorded Information

  
Deputy Clerk

On (Recorded Date) : 08/14/2006

At (Recorded Time) : 12:42:09PM



Doc ID - 003711000006





## CONVEYANCE NOTIFICATION

### SHELL TAFT FACILITY

Shell Chemical LP hereby notifies the public that the following Facility located at Agency Interest Number (AI # 583) was closed with contaminant levels present that are acceptable for industrial/commercial use of the property as described in the Louisiana Department of Environmental Quality's (LDEQ) Risk Evaluation/Correction Action Program (RECAP), Section 2.9. In accordance with LAC 33:I., Chapter 13, if land use changes from industrial to non-industrial, the responsible part shall notify the LDEQ within 30 days and the site shall be reevaluated to determine if conditions are appropriate for the proposed land use.

This site was closed in accordance with the Louisiana Administrative Code, Title 33:I, Chapter 13. Information regarding the site is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of the site may be directed to Earl Hayden at Shell Chemical LP, One Shell Plaza, 910 Louisiana, Houston, Texas 77002-4916.

#### Site Legal Description

That certain tract or parcel of land being located in portions of Sections 44 and 45 of T. 13 S., R. 20 E., West of the Mississippi River, near Taft in St. Charles Parish, Louisiana, and being more particularly described as follows:

Beginning at an ½" iron pipe in concrete which is the southeast corner of a tract of land containing 29.904 acres conveyed by deed from Union Carbide Corporation to the Argus Chemical Corporation (presently the Chemtura Corporation) dated March 29, 1966 and filed and recorded in the Registry's office in Conveyance Office Book 54, Folio 338, said beginning point also being located 200 feet northerly, measured at right angles, from the centerline of the Texas and Pacific Railroad right-of-way, and running thence from said beginning point with a line parallel to and 200 feet from centerline of the railroad right-of-way which is the southernmost boundary of the Chemtura Corporation tract N 57°01'00" W for a distance of 493.18 feet to the "Point of Beginning";

Thence running, from the "Point of Beginning", N 57°01'00" W for a distance of 903.13 feet;

Thence running N 16°20'30" W for a distance of 103.48 feet;

Thence running N 17°51'00" E for a distance of 630.97 feet;

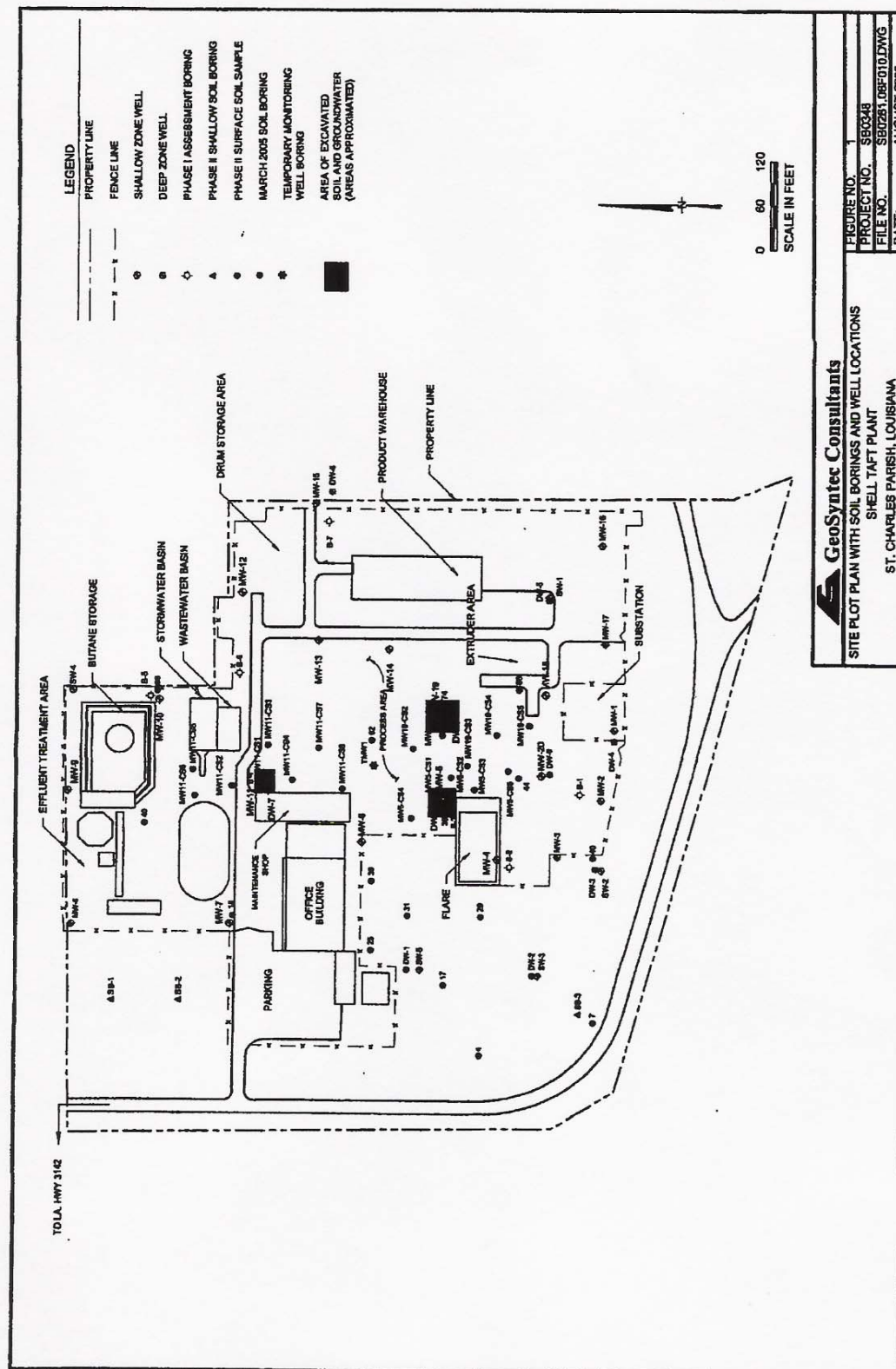


Table 1  
Summary of Constituents Remaining at Site

Compound	Units	Maximum Concentration Remaining On-Site	Location	RECAP MO-1 Standard
<sup>1</sup> SOIL				
Diesel range organics	mg/kg	3200	MW5-CS2	10000
*Biphenyl phenyl ether	mg/kg	160	MW19-CS4	1100
*Diphenyl ether	mg/kg	580	MW5-CS4	1100
<sup>2</sup> GROUNDWATER				
Diesel range organics	mg/L	4.62	SW-5	5280
Gasoline range organics	mg/L	0.555	MW-15	6820
Biphenyl phenyl ether	mg/L	0.61	MW-10	21
Diphenyl ether	mg/L	0.0737	MW-13	21
DH-isopropyl ether	mg/L	0.345	MW-15	2420
Bis(2-ethyl-hexyl)phthalate	mg/L	0.018	DW-01	0.07

Notes:

mg/kg = milligrams per kilogram  
mg/L = milligrams per liter

<sup>1</sup> Maximum detected concentration of soil is based on analytical results for site borings that were not excavated as part of remedial activities.

\* Maximum concentration allowable under RECAP

# MO-1 standard based on soil saturation value.

<sup>2</sup> Maximum detected concentration reported in most recent sampling of site monitoring wells in which DNAPL was not observed. MO-1 standards based on GW-3 non-drinking water groundwater classification.

Table includes constituents with concentrations that exceeded published RECAP non-industrial screening standards.





22 August 2006

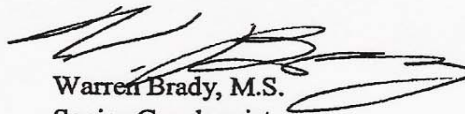
Mr. Jeffery Jones  
Remediation Services Division  
Louisiana Department of Environmental Quality  
602 N. Fifth Street  
Baton Rouge, LA 70802

**Subject: DNAPL Remediation Report and No Further Action Request  
Supplemental Information  
Shell Chemical LP- Taft, Louisiana  
AI # 583**

Dear Mr. Jones:

At the request of Mr. Earl Hayden (Shell Chemical LP), GeoSyntec Consultants has developed the following information in support of the DNAPL Remediation Report submitted on August 14, 2006 for the above-referenced facility. Attached please find additional conveyance notification information that documents that these records were incorporated into the St. Charles Parish mortgage records. This information is provided based on your verbal request made on 21 August 2006. If you require additional information please feel free to contact me at 225-929-7333.

Sincerely,

  
Warren Brady, M.S.  
Senior Geochemist

Enclosure

cc: E. Hayden - Shell  
B. Phelan - EIM  
R. Ettinger - GeoSyntec



## Recordation Certificate

Charles J. Oubre, Jr.  
Clerk of Court  
St. Charles Parish Courthouse  
PO Box 424  
Hahnville, LA 70057  
(985) 783-6632

**First MORTGAGOR**

SHELL CHEMICAL LP

**First MORTGAGEE**

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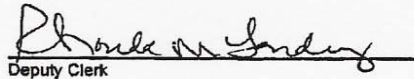
Index Type : MORTGAGE  
Type of Document : AFFIDAVIT

Entry Number : 321838

Book : 1159      Page : 643

Recording Pages :            6

**Recorded Information**

  
Deputy Clerk

On (Recorded Date) : 08/22/2006

At (Recorded Time) : 10:11:59AM



Doc ID - 003726740006



## CONVEYANCE NOTIFICATION

### SHELL TAFT FACILITY

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This site was closed in accordance with the Louisiana Administrative Code, Title 33:I, Chapter 13. Information regarding the site is available in the LDEQ public record and may be obtained by contacting the LDEQ Records Manager at (225) 219-3168. Inquiries regarding the contents of the site may be directed to Earl Hayden at Shell Chemical LP, One Shell Plaza, 910 Louisiana, Houston, Texas 77002-4916.

#### Site Legal Description

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Beginning at an 1/2" iron pipe in concrete which is the southeast corner of a tract of land containing 29.904 acres conveyed by deed from Union Carbide Corporation to the Argus Chemical Corporation (presently the Chemtura Corporation) dated March 29, 1966 and filed and recorded in the Registry's office in Conveyance Office Book 54, Folio 338, said beginning point also being located 200 feet northerly, measured at right angles, from the centerline of the Texas and Pacific Railroad right-of-way, and running thence from said beginning point with a line parallel to and 200 feet from centerline of the railroad right-of-way which is the southernmost boundary of the Chemtura Corporation tract N 57°01'00" W for a distance of 493.18 feet to the "Point of Beginning";

Thence running, from the "Point of Beginning", N 57°01'00" W for a distance of 903.13 feet;

Thence running N 16°20'30" W for a distance of 103.48 feet;

Thence running N 17°51'00" E for a distance of 630.97 feet;



Thence running S 72°15'00" E for a distance of 642.01 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 194.73 feet to a 1" rod;

Thence running S 72°15'00" E for a distance of 121.68 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 18.54 feet to a 1" rod;

Thence running S 72°15'00" E for a distance of 135.70 feet to a 1" rod;

Thence running S 17°45'00" W for a distance of 663.98 feet;

Thence running S 02°54'00" E for a distance of 81.98 feet the "Point of Beginning".

Said tract contains 15.78 acres and is shown as Parcel "A" on a drawing entitled "Proposed Shell Land Purchase of Taft Facility" by Waldemar S. Nelson & Co., Inc., Revision 1, dated June 15, 1990

Being the same property acquired by Shell Oil Company from Witco Corporation (currently Chemtura Corporation) by act on June 25<sup>th</sup>, 1990, recorded in the Conveyance Records of St. Charles Parish in Book 425, Folio 562, Entry No. 151385.

A site map is provided in the attached figure. Table 1 identifies the concentration of constituents remaining on-site in soil and groundwater.

  
Signature of Person Filing Parish Record

Warren Brady, Senior Geochemist, GeoSyntec Consultant  
Typed Name and Title of Person Filing Parish Record

8/22/06  
Date

**Table 1**  
Summary of Constituents Remaining at Site

Compound	Units	Maximum Concentration Remaining On-Site	Location	RECAP MO-1 Standard
<b>SOIL</b>				
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Diphenyl ether	mg/kg	580	MW5-CS4	1100
<b>GROUNDWATER</b>				
Diesel range organics	mg/L	4.62	SW-5	5280
Gasoline range organics	mg/L	0.555	MW-15	6820
Biphenyl phenyl ether	mg/L	0.61	MW-10	21
Diphenyl ether	mg/L	0.0737	MW-13	21
Di-isopropyl ether	mg/L	0.345	MW-15	2420
Bis(2-ethyl-hexyl)phthalate	mg/L	0.018	DW-01	0.07

Notes:

mg/kg = milligrams per Kilogram

mg/L = milligrams per liter

<sup>1</sup> Maximum detected concentration of soil is based on analytical results for site borings that were not excavated as part of remedial activities.

\* Maximum concentration allowable under RECAP

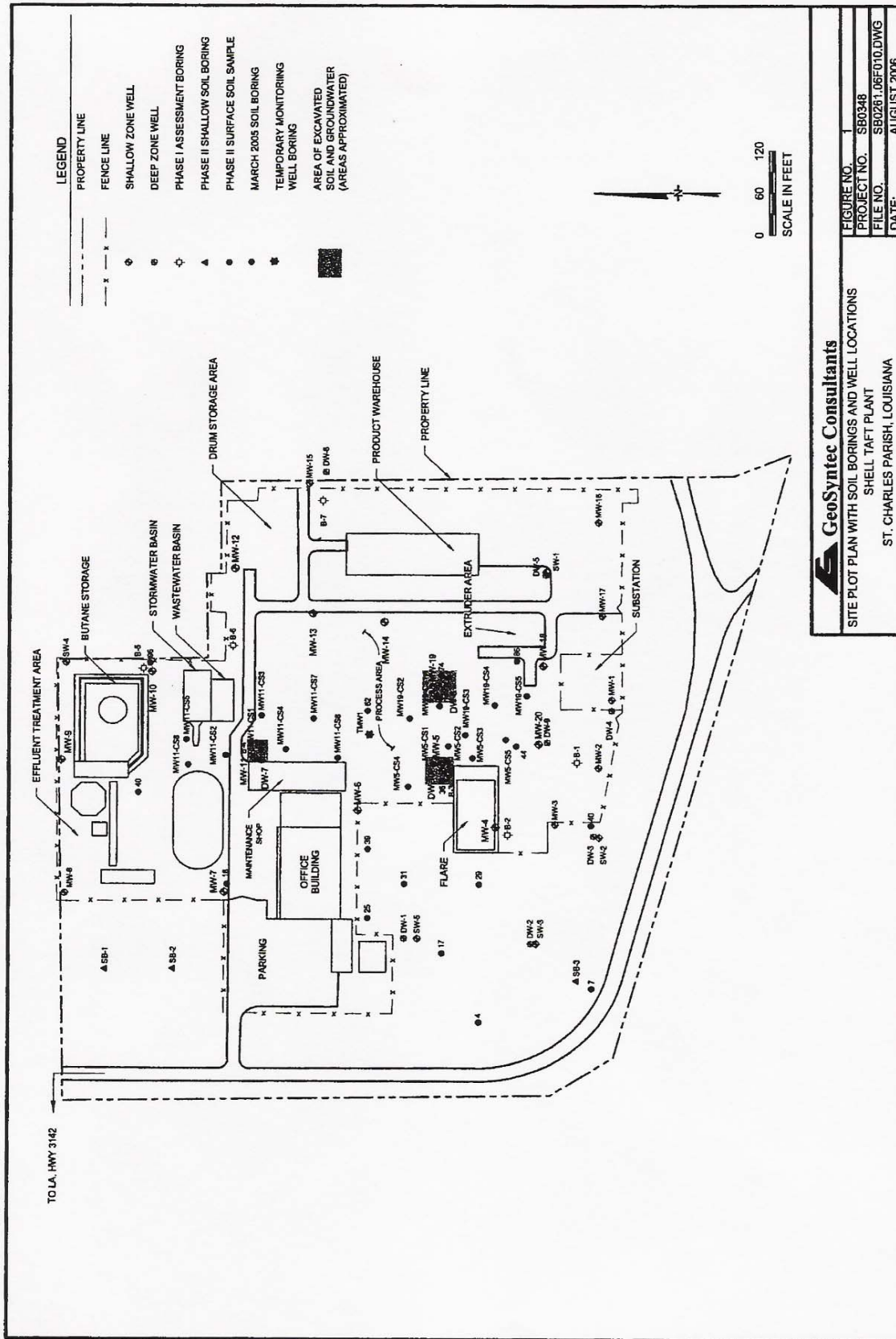
# MO-1 standard based on soil saturation value.

<sup>2</sup> Maximum detected concentration reported in most recent sampling of site monitoring wells in which DNAPL was not observed. MO-1 standards based on GW-3 non-drinking water groundwater classification.

Table includes constituents with concentrations that exceeded published RECAP non-industrial screening standards.









LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
FIELD INTERVIEW FORM

AGENCY INTEREST#: 583 INSPECTION DATE: 8/03/06 TIME OF ARRIVAL: 9:00 AM  
ALTERNATE ID#: \_\_\_\_\_ DEPARTURE DATE: 8/05/06 TIME OF DEPARTURE: 10:45 AM  
FACILITY NAME: Shell Chemical - TART PLANT PH #: (713) 241-1232  
LOCATION: 413 Hwy 8142

RECEIVING STREAM (BASIN/SUBSEGMENT): \_\_\_\_\_ PARISH NAME: ST. CHARLES  
MAILING ADDRESS: ONE Shell Plaza, 910 Louisiana Houston TX 77002  
(Street/P.O. Box) (City) (State) (Zip)  
FACILITY REPRESENTATIVE: Earl Shatten TITLE: Facilities Representative  
FACILITY REPRESENTATIVE PHONE NUMBER: (713) 241-1232  
NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): Same

INSPECTION TYPE: HAZ-ATA PROGRAM INVOLVED: AIR WASTE WATER OTHER SH/SM

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

Conducted NFA inspection of facility. All monitoring wells appeared to be properly plugged and abandoned and all waste associated with the remediation program - DNAPL impacted soils/sediment - has been removed from the site. No current threat of GHD Syntex, agent for Shell Chemical, conducted the remediation work. Excavation areas were completely backfilled. Reviewed draft notification

AREAS OF CONCERN:

REGULATION

EXPLANATION

CORRECTED?

NA

NA

YES NO  
NA  
YES NO

PHOTOS TAKEN: ☐ YES ☒ NO

SAMPLES TAKEN: ☐ YES ☒ NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: Turned to Earl Shatten, Shell Chemical

PRINT NAME:

(NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): Jeffrey Jones, EIT  
Georgias

CROSS REFERENCE: \_\_\_\_\_

ATTACHMENTS: NA

REVIEWER: \_\_\_\_\_

NOTE: The information contained on this form reflects only the preliminary observations of the Inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statute regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

### **ENCLOSURE 3**

#### **AGENCY AND INDUSTRY CONTACTS**

For a copy of the administrative record providing detailed information regarding environmental conditions at Shell Chemical LP – Taft Facility, please contact:

Louisiana Department of Environmental Quality  
Public Records Center  
Galvez Building, Room 127  
602 N. Fifth St.  
Baton Rouge, LA 70802  
(225) 219-3168

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for Shell Chemical L P – Taft Facility, please contact:

Mr. Jeffrey Jones, Geologist & Team Leader  
Environmental Technology Division  
Louisiana Department of Environmental Quality  
P.O. Box 4314  
Baton Rouge, Louisiana 70821-4314  
(225) 219-3397

Mr. Earl Hayden, Business Representative  
Shell Chemical LP  
One Shell Plaza  
910 Louisiana Street  
Houston, TX 77002-4916  
(713) 241-1232